

June 14, 2007

Dear Market Advisory Committee:

I am writing to say that I am opposed to the recommendations in the June 1st draft MAC report to exclude methane emissions from landfills from complying with a cap, while still allowing landfill operators to obtain carbon credits for the energy they produce. This would result in an increased financial incentive for landfilling organic materials and the under-regulation of the largest anthropogenic source of methane, a potent greenhouse gas. I believe that we should disallow organics from being put in the landfill to avoid the production of methane in the first place. By composting organic material rather than landfilling, we don't create methane in the first place and therefore do not have to manage it.

I also agree with Scott Smithline with Californians Against Waste's points below:

"Landfill operators will be able to reap the benefits of an offset program from landfill gas to energy but experience no negative consequences for the increase in their fugitive emissions resulting from the additional organics disposed. CAW opposes this MAC recommendation:

By allowing carbon offsets to be allocated for landfill gas, the landfill operator will have a direct monetary benefit to producing more landfill gas.

Since the additional fugitive emissions from landfills would not be included in the cap, this would likely result in an increased demand for organics at landfills and subsequently a lower tipping fee for greenwaste at landfills.

Lower tip fees at landfills will divert additional organics away from compost facilities.

Composting is a significant greenhouse gas emission mitigation measure because it results in greater carbon sequestration in crop biomass, a decrease in the need for GHG-releasing fertilizers and pesticides, and a decline in energy-intensive irrigation.

A net increase in GHG emissions may result because landfill gas capture systems only capture a fraction of the landfill gas generated. The IPCC estimates that lifetime efficiencies are as low as 20% for landfills.

Most landfills are already required to capture and destroy their fugitive emissions. Giving offset credits for these systems would violate the additional requirements of a market system. Companies should not be able to sell credits for something that they are legally required to do because it would not result in any further greenhouse gas reductions.

The adoption of these recommendations directly conflicts with existing state waste reduction and recycling programs and policies. The Integrated Waste Management Act states that recycling and composting are to be prioritized over landfill disposal and that the state should maximize recycling and composting. These recommendations would take us a step backwards in waste reduction and composting.

Offsets from landfill gas to energy should not be supported until the ARB establishes that the offsets are additional and would result in a net decrease of GHG emissions from landfills and provide an overall environmental benefit to California."

Please rethink how these recommendations will actually encourage the production of more methane than decrease it.

Sincerely,

Judi Gregory  
Global Resources